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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 JEAN-MARC BOUJU,

11 Plaintiff,

12 v.

13 THE PRUDENTIAL INSURANCE
14 COMPANY OF AMERICA,

15 Defendant.

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) Case No. 2:17-cv-01478-RSM
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**JOINT MOTION AND ORDER TO
EXTEND DEADLINE FOR FILING
DISPOSITIVE MOTIONS**

16 Plaintiff Jean-Marc Bouju (“Plaintiff”) and Defendant The Prudential Insurance
17 Company of America (“Prudential”) (collectively referred to as “the parties”), by and through
18 their respective attorneys, hereby move to extend the deadline for filing dispositive motions
19 from May 23, 2018 to June 20, 2018. In support of their joint motion, the parties state as
20 follows:

21 1. Plaintiff filed this lawsuit seeking long-term disability (“LTD”) benefits
22 pursuant to Section 502(a)(1)(B) of the Employee Retirement Income Security Act of 1974
23 (“ERISA”).

24 2. In its November 16, 2017 scheduling order (ECF No. 12), the Court set the
25 deadline for filing dispositive motions for May 15, 2018.
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JOINT MOTION TO EXTEND DEADLINE FOR FILING
DISPOSITIVE MOTIONS (Case No.: 2:17-CV-01478-
RSM) - 1

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1 3. On May 2, 2018, the parties filed a joint motion to extend the deadline for filing
2 dispositive motions for May 23, 2018 because Plaintiff's counsel would be out of state on the
3 original May 15, 2018 deadline set by the Court. (*See* ECF No. 17.)

4 4. On May 3, 2018, the Court granted the parties' motion and set the new deadline
5 for filing dispositive motions for May 23, 2018. (*See* ECF No. 18.)

6 5. The parties have recently discussed mediating this matter, and have scheduled a
7 mediation for June 6, 2018 with mediator John Cooper in Seattle, Washington.

8 6. In order to avoid any potentially unnecessary expenses associated with briefing
9 dispositive motions, the parties respectfully request moving the dispositive motion briefing
10 deadline from May 23, 2018 to June 20, 2018.

11 7. On May 10, 2018, the parties conferred, scheduled mediation for June 6, 2018
12 with John Cooper, and agreed to file this joint motion to extend the dispositive motion
13 deadlines.

14 8. No other deadlines will be affected by this motion.

15 9. This is the parties' second request for an extension related to filing dispositive
16 motions.

17 10. This motion is filed in good faith and not for the purpose of unwarranted delay.

18 WHEREFORE, the parties jointly and respectfully request that the Court issue an order
19 extending the dispositive motion deadline from May 23, 2018 to June 20, 2018. A proposed
20 order related to the relief sought in this motion is filed herewith.

1 DATED: May 10, 2018

DATED: May 10, 2018

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3 THE WOOD LAW FIRM

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Attorneys for Defendant The Prudential Life
Insurance Company of America

1
2 **ORDER**

3 Considering the Parties' Joint Motion to Extend the Deadline for Filing Dispositive
4 Motions, and the Court being sufficiently advised:

5 IT IS ORDERED that the motion be granted and that the deadline to file dispositive
6 motions is extended to June 20, 2018.

7 DATED this 11th day of May 2018.

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9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE
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